

NEWCHAPTER®

22 High St. Brattleboro, VT 05301 Phone: (802) 257 - 0018

August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov
Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

New Chapter, Inc., is a certified organic manufacturer of food-based supplements. While we fully understand that there is not currently a standard for supplements under the NOP, we hope that one will exist in the very near future. In that hope, we urge the NOSB to consider the retention of the following materials on that National List.

205.605(a) materials:

- Citric Acid – important for the pH-adjustment of our formulations
- Calcium Carbonate – important as a source of calcium
- Dairy Cultures – as we are manufacturers of probiotic nutrients, live cultures are essential to many of our formulations
- Plant Enzymes – essential in many of our probiotic nutrients

205.605(b) materials:

- Carbon Dioxide – the non-toxic solvent used for our most important extracted botanicals (ginger and turmeric)
- Cellulose – the material used for our vegetable-based capsules
- Magnesium Stearate – a potentially important excipient for our MWOI tablets
- Nutrient Vitamins and Minerals – the base materials that we culture for our probiotic nutrients
- Ozone – only effective method of controlling bacterial sterilization of herbs and spices allowed in organics
- Silicon Dioxide – an important excipient, used to form tablets
- Tocopherols – an excellent source of vitamin E, far preferable to any soy-based vitamin E, which may be GMO-contaminated.

NEWCHAPTER®

22 High St. Brattleboro, VT 05301 Phone: (802) 257 - 0018

We would also like to comment on the exclusion of the following materials from the National List.

205.605(a) material

- Yeast – while this material is crucial to our probiotic line, we believe that it should be considered agricultural, and therefore, certifiable as organic. As such, it should not longer e on the National List.

205.606(b) materials

- Cornstarch – widely available in many forms as certified organic, this material should no longer be on the National list, because its mere presence leads end-users to believe that they can use the conventional forms.
- Gums (Arabic, Locust Bean and Carob Bean) – also commercially available as organic, and therefore, no longer eligible for inclusion on the National List.

Thank you for you consideration.

Sincerely,

Bradley Marr
Director, Quality Assurance and Regulatory Compliance
NewChapter, Inc,
22 High St.
Brattleboro, VT 05301